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*Attorneys for Defendant Sonos, Inc.*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

GOOGLE LLC,  
  
Plaintiff,  
  
v.  
  
SONOS, INC.,  
  
Defendant.

Case No. 3:20-cv-06754-WHA

**DECLARATION OF GEOFFREY MOSS  
IN SUPPORT OF SONOS, INC.'S  
UNOPPOSED MOTION FOR LEAVE TO  
AMEND INFRINGEMENT  
CONTENTIONS PURSUANT TO  
PATENT L.R. 3-6**

Date: May 12, 2022

Time: 8:00 a.m.

Place: Courtroom 12, 19<sup>th</sup> Floor

Judge: Hon. William Alsup

Complaint Filed: September 28, 2020

1 I, Geoffrey Moss, declare as follows and would so testify under oath if called upon to do  
2 so:

3 1. I am an attorney with the law firm of Orrick, Herrington & Sutcliffe LLP, counsel  
4 of record to Sonos, Inc. ("Sonos") in the above-captioned matter. I am a member in good standing  
5 of the Bar of the State of California. I make this declaration based on my personal knowledge,  
6 unless otherwise noted. If called, I can and will testify competently to the matters set forth herein.

7 2. I make this declaration in support of Sonos's Unopposed Motion for Leave to  
8 Amend its Infringement Contentions Pursuant to Patent L.R. 3-6.

9 3. Between February 1, 2022 and March 8, 2022, Sonos reviewed Google's source  
10 code, including source code for the YouTube TV and YouTube Kids apps, on 16 days.

11 4. Attached as **Exhibit A** is an email dated March 8, 2022, from Alyssa Caridis to  
12 Google's counsel notifying them of Sonos' intent to move the Court to supplement Sonos's  
13 infringement contentions in light of Google's production of source code for the YouTube TV and  
14 YouTube Kids apps.

15 5. Attached as **Exhibits B and C** are true and correct copies of excerpts from  
16 Sonos's proposed amended infringement contentions for the '615 and '033 patents that show all  
17 of the proposed changes in redline. The full and complete proposed amended infringement  
18 contention charts for the '615 and '033 patents were served on Google's counsel on March 8,  
19 2022.

20 6. Attached as **Exhibit D** is an email dated March 16, 2022 from Marc Kaplan,  
21 Google's counsel, to Sonos' counsel stating that it does not oppose Sonos' motion.

22 7. Attached as **Exhibit E** is a letter dated September 23, 2021 to Jordan Jaffe re  
23 Google's discovery responses.

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1           8.       Attached as **Exhibit F** is an email thread between counsel for Sonos and counsel  
2 for Google sent between November 17, 2021 and December 29, 2021.

3           I declare under penalty of perjury that the foregoing is true and correct to the best of my  
4 knowledge. Executed this 18th day of March, 2022 in Los Angeles, California.

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GEOFFREY MOSS